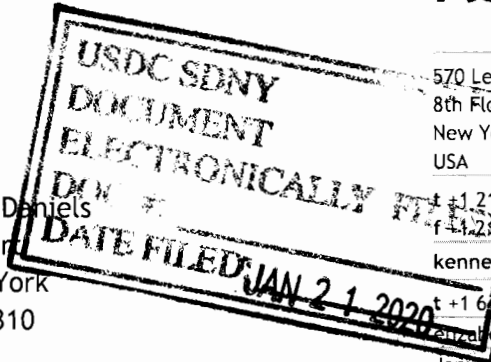


Our ref USP050.894691

Kennedys

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street, Room 1310
New York, NY 10007



570 Lexington Avenue
8th Floor
New York, NY 10022
USA

t +1 212.252.0004
f +1 212.832.4920
kennedyslaw.com
t +1 646.625.3981
elizabeth.streelman@kennedyslaw.com
January 15, 2020

Re: Martinez v. Harbor Express, et al.
SDNY Docket No. : 1:15-cv-07458
Leon v. Harbor Express, et al
SDNY Docket No.: 7:15-cv-07483

Dear Judge Daniels:

Our office represents defendant, Harbor Express L.L.C., in the above-referenced action. In lieu of the appearance scheduled before Your Honor for tomorrow, January 16, 2020, counsel for the parties have met and conferred and propose the following schedule to complete expert discovery and dispositive motion practice.

- Plaintiff De La Rosa Martinez to serve all remaining expert exchanges on or before February 14, 2020;
- Plaintiff(s) to conduct the expert deposition of C. Bruce Gambardella, P.E. on or before February 28, 2020;
- Any dispositive motions to be filed on or before April 30, 2020;
- Opposition to motions to be filed on or before June 2, 2020;
- Replies to motion to be filed on or before June 23, 2020.

Thank you for the Court's time and consideration.

Respectfully submitted,

/s/ Elizabeth Streelman
Elizabeth Streelman
Associate
for Kennedys

JAN 21 2020

SO ORDERED

A status conference is
scheduled for April 16, 2020 at
9:45 a.m.

George B. Daniels
HON. GEORGE B. DANIELS

Kennedys is a trading name of Kennedys CMK LLP. Kennedys Law LLP, a UK Limited Liability Partnership, is a partner of Kennedys CMK LLP

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